IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

TAKEDA GMBH, ASTRAZENECA PHARMACEUTICALS LP, and ASTRAZENECA UK LIMITED,)	
Plaintiff,)	
v.)	Civil Action No. 1:15-cv-00093
MYLAN PHARMACEUTICALS, INC.,)	
Defendant.)	
)	

PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER RELIEVING THEM OF THE OBLIGATION TO RESPOND TO DISCOVERY UNTIL RESOLUTION OF PLAINTIFFS' MOTION TO STAY

Of Counsel:

WILMER CUTLER PICKERING HALE AND DORR LLP

Amy K. Wigmore Tracey C. Allen 1875 Pennsylvania Avenue, NW Washington, DC 20006 Tel.: (202) 663-6000

Fax: (202) 663-6363

amy.wigmore@wilmerhale.com tracey.allen@wilmerhale.com

SCHRADER BYRD & COMPANION, PLLC

James F. Companion (WV Bar #7290) Yolonda G. Lambert (WV Bar #2130) The Maxwell Centre 32 20th Street, Suite 500 Wheeling, WV 26003 Tel.: (304) 233-3390 Fax: (304) 233-2769 ifc@schraderlaw.com ygl@schraderlaw.com

Attorneys for Plaintiffs Takeda GmbH, AstraZeneca Pharmaceuticals LP, and AstraZeneca UK Limited

Dated: October 9, 2015

Pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 26.05(a), and for the reasons set forth in the accompanying brief, Plaintiffs Takeda GmbH, AstraZeneca Pharmaceuticals LP, and AstraZeneca UK Limited hereby move for a protective order relieving them of the obligation to respond to discovery until their pending motion to stay is resolved.

Dated: October 9, 2015

SCHRADER BYRD & COMPANION, PLLC

/s/ James F. Companion

James F. Companion (#7290) Yolonda G. Lambert (#2130) The Maxwell Centre 32-20th Street, Suite 500 Wheeling, WV 26003 (304) 233-3390 jfc@schraderlaw.com ygl@schraderlaw.com

Attorneys for Plaintiffs Takeda GmbH, AstraZeneca Pharmaceuticals LP, and AstraZeneca UK Limited

Of Counsel:

WILMER CUTLER PICKERING HALE AND DORR LLP

Amy K. Wigmore Tracey C. Allen 1875 Pennsylvania Avenue, NW Washington, DC 20006 (202) 663-6000 amy.wigmore@wilmerhale.com tracey.allen@wilmerhale.com

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of October, 2015, I electronically filed the foregoing

PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER RELIEVING THEM OF THE OBLIGATION TO RESPOND TO DISCOVERY UNTIL RESOLUTION OF

PLAINTIFFS' MOTION TO STAY with the clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to the following:

Gordon H. Coplan (WV Bar #828)
William J. O'Brien (WV Bar #10549)
Christopher A. Lauderman (WV Bar #11136)
STEPTOE & JOHNSON PLLC
400 White Oaks Boulevard
Bridgeport, WV 26330
Tel.: (304) 933-8000
Fax: (304) 933-8183
gordon copland@steptoe-johnson.com

gordon.copland@steptoe-johnson.com william.obrien@steptoe-johnson.com chris.lauderman@steptoe-johnson.com

Dennis Gregory
WILSON SONSINI GOODRICH & ROSATI
1301 Avenue of the Americas
New York, NY 10019
Tel.: (212) 999-5800
dgregory@wsgr.com

Mary Procaccio-Flowers
Nancy Zhang
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, CA 94304
Tel.: (650) 493-9300
mprocaccioflowers@wsgr.com
nzhang@wsgr.com

Tung-On Kong Wilson Sonsini Goodrich & Rosati One Market-Spear Tower, Suite 3300 San Francisco, CA 94105 Tel.: (415) 947-2016 tkong@wsgr.com

Attorneys for Defendant Mylan Pharmaceuticals, Inc.

/s/ James F. Companion

James F. Companion (WV Bar #7290) Yolonda G. Lambert (WV Bar #2130) SCHRADER BYRD & COMPANION, PLLC The Maxwell Centre 32 20th Street, Suite 500 Wheeling, WV 26003 Tel.: (304) 233-3390

Tel.: (304) 233-3390 Fax: (304) 233-2769 jfc@schraderlaw.com ygl@schraderlaw.com

Attorneys for Plaintiffs Takeda GmbH, AstraZeneca Pharmaceuticals LP, and AstraZeneca UK Limited